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RICHARD A. MARSHACK
7

8 UNITED STATES BANKRUPTCY COURT
9 CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION

10 In re
11 NORTHERN HOLDING, LLC,
12 Debtor.
13

Case No. 8:20-bk-13014-ES

Chapter 7

STIPULATION RE: EXTENSION OF
TIME FOR RESPONSIVE PLEADING
FROM LEROY “LEE” CODDING TO
MOTION FOR ISSUANCE OF ORDER
TO SHOW CAUSE RE: CIVIL
CONTEMPT

[MOTION DOCKET NO. 304]

[NO HEARING REQUIRED]

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18 TO THE HONORABLE ERITHE A. SMITH, UNITED STATES BANKRUPTCY JUDGE, THE
19 OFFICE OF THE UNITED STATES TRUSTEE, AND ALL INTERESTED PARTIES:

20 This stipulation is entered into between Richard A. Marshack, in his capacity as Chapter 7
21 Trustee (“Trustee”) of the Bankruptcy Estate (“Estate”) of Northern Holding, LLC (“Debtor”), and
22 Leroy “Lee” Coddling (“Mr. Coddling”) (together, the “Parties”), through undersigned counsel,
23 regarding an extension of Mr. Coddling’s deadline to file a response to Trustee’s motion for issuance
24 of an order to show cause re: civil contempt filed on April 1, 2022, as Docket No. 304.

25 **Recitals**

26 A. On April 1, 2022, as Dk. No. 304, Trustee filed a motion for issuance of an order to
27 show cause re: civil contempt against Mr. Coddling (“Motion”). Under Local Bankruptcy Rule 9020-
28 1(d), Mr. Coddling has a seven-day period to file a response to the Motion.

1 The Parties agree and STIPULATE as follows:

- 2 1. Mr. Coddington shall have an extended period to file a response or opposition to the
3 Motion, through and including April 20, 2022, without prejudice to further stipulated extensions.
4 2. The Parties jointly request that no order be entered on the Motion prior to April 20,
5 2022.
6 3. This stipulation may be executed in one or more counterparts and facsimile or
7 electronic signatures may be used in filing this document with the Court.


8
9 Dated: April 5, 2022

MARSHACK HAYS LLP

10 By: /s/ Tinho Mang
11 D. EDWARD HAYS
12 TINHO MANG
13 Attorneys for Chapter 7 Trustee
14 RICHARD A. MARSHACK

15
16 Dated: April 5, 2022

GOE FORSYTHE & HODGES LLP

17 By: 
18 ROBERT P. GOE
19 BRANDON J. ISKANDER
20 Attorneys for Respondent
21 LEROY "LEE" CODDING
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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
870 Roosevelt, Irvine, CA 92620

A true and correct copy of the foregoing document entitled: STIPULATION RE: EXTENSION OF TIME FOR RESPONSIVE PLEADING FROM LEROY "LEE" CODDING TO MOTION FOR ISSUANCE OF ORDER TO SHOW CAUSE RE: CIVIL CONTEMPT will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **April 5, 2022**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL: On **April 5, 2022**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL: Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **April 5, 2022**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

VIA PERSONAL DELIVERY:
PRESIDING JUDGE'S COPY

HONORABLE ERITHE A. SMITH
UNITED STATES BANKRUPTCY COURT, CENTRAL DISTRICT OF CALIFORNIA
RONALD REAGAN FEDERAL BUILDING AND COURTHOUSE
411 WEST FOURTH STREET, SUITE 5040 / COURTROOM 5A
SANTA ANA, CA 92701-4593

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

April 5, 2022
Date

Layla Buchanan
Printed Name

/s/ Layla Buchanan
Signature

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): CONTINUED:

- **INTERESTED PARTY COURTESY NEF:** William H Brownstein Brownsteinlaw.bill@gmail.com
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2. SERVED BY UNITED STATES MAIL: CONTINUED:

DEBTOR

NORTHERN HOLDING, LLC

ATTN: OFFICER, A MANAGING OR GENERAL AGENT,

OR TO ANY OTHER AGENT AUTHORIZED BY

APPOINTMENT OR LAW TO RECEIVE SERVICE

13217 JAMBOREE RD #429

TUSTIN, CA 92782